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MICHIGAN CHAPTER

Via email to:

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January 18, 2013

Re: **MIG010135 Hillside Farms Riverton**
3430 Stiles Road Scottville
900 Schoenher Road Branch, MI

Dear Mike,

Thank you for the opportunity to provide public comment on the Hillside Farms, Riverton CAFO's NPDES COC.

The number of animals and waste produced and stored is not clear. There are two locations for this permit COC that states 12,000 animals but it does not state whether this is one location or both or does this mean per batch at one time? It is not clear what size of swine are at these facilities. It also does not list waste containment separately at these facilities?

If these waste materials are not appropriately planned for, then land over-application may be needed to empty waste storage structures before winter. As is well known to the MDEQ, over-application of liquefied animal manure waste can cause excess nutrient runoff both from overland flow and from seepage into field drainage tiles, and nitrate seepage downward into drinking water supplies. Please see the attached USEPA report, *Relation Between Nitrate in Water Wells and Potential Sources in the Lower Yakima Valley, Washington*. This facility shows manifesting of all waste. Does this facility manifest waste back to themselves under another name or to one of their other CAFO facilities?

I have included for your information several studies of deleterious public health repercussions and dangerous environmental impacts to both air and water quality, as a result of concentrated animal feeding operations that are located in high densities in watersheds, and in human communities. We will include these studies, and others, to continue to provide scientific information about the harmful and even toxic effects of industrial farm animal production to our communities.

- 1) *The Pew Commission on Industrial Farm Animal Production Report*, 2008;
- 2) *CAFOs Uncovered: The Untold Costs of Confined Animal Feeding Operations*, 2008, Union of Concerned Scientists;
- 3) *Hogging It: Estimates of Antimicrobial Abuse in Livestock*, 2001, Union of Concerned Scientists;
- 4) *Airborne cow allergen, ammonia and particulate matter at homes vary with distance to industrial scale dairy operations: an exposure assessment*, Williams et al. Environmental Health 2011, 10:72, <http://www.ehjournal.net/content/10/1/72>;
- 5) *Relation Between Nitrate in Water Wells and Potential Sources in the Lower Yakima Valley, Washington*, EPA-910-R-12-003 | www.epa.gov

Please note -- in order to receive funding through NRCS for EQIP:

The CNMP must be developed and approved by a certified provider **prior** to construction of the waste storage or treatment facility and be fully implemented prior to contract completion.

Please see the NRCS Guidance Document here: [ftp://ftp-](ftp://ftp-fc.sc.egov.usda.gov/MI/programs/EQIP/2012/FY%202012%20EQIP%20Guidance%20Document.pdf)

[fc.sc.egov.usda.gov/MI/programs/EQIP/2012/FY%202012%20EQIP%20Guidance%20Document.pdf](ftp://ftp-fc.sc.egov.usda.gov/MI/programs/EQIP/2012/FY%202012%20EQIP%20Guidance%20Document.pdf)

Has this CAFO facility received any EQIP funding for waste storage structures that have been constructed at this site? If yes have Resource Considerations been inventoried?

This facility should be required to have an individual permit due to past violations:

81872	Schedule of Compliance	Compliance Schedule Not Received by Due Date	7/2/2008 0:00
Active 114769	1	Hillside Farms-Riverton-CAFO	Mason Cadillac 74889
2	MIG010135	25687 Garth Aslakson	
85964	Schedule of Compliance	Compliance Schedule Not Received by Due Date	4/2/2008 0:00
Active 114769	1	Hillside Farms-Riverton-CAFO	Mason Cadillac 74889
2	MIG010135	25683 Garth Aslakson	
89385	Schedule of Compliance	Compliance Schedule Not Received by Due Date	4/2/2009 0:00
Active 114769	1	Hillside Farms-Riverton-CAFO	Mason Cadillac 74889
2	MIG010135	25684 Garth Aslakson	
98539	Schedule of Compliance	Compliance Schedule Not Received by Due Date	4/2/2010 0:00
Active 114769	1	Hillside Farms-Riverton-CAFO	Mason Cadillac 74889
2	MIG010135	25685 Garth Aslakson	

Was a completed CNMP turned in with the application?

Again, thank you for the opportunity to provide our comments on this CAFO NPDES COC.

Lynn Henning
2010 Goldman Environmental Prize
CAFO Water Sentinel
Sierra Club Michigan Chapter

FOIA Exemption (b) (6)